

ALVERSON TAYLOR & SANDERS  
KURT R. BONDS, ESQ.  
Nevada Bar #6228  
TREVOR R. WAITE, ESQ.  
Nevada Bar #13779  
6605 GRAND MONTECITO PARKWAY  
SUITE 200  
LAS VEGAS, NEVADA 89149  
(702) 384-7000  
FAX (702) 385-7000  
[efile@alversontaylor.com](mailto:efile@alversontaylor.com)  
*Attorneys for Defendant,*  
*EDUCATIONAL CREDIT MANAGEMENT CORPORATION*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

LEISA WHITTUM;

Plaintiff,

v.

EDUCATIONAL CREDIT  
MANAGEMENT CORPORATION, a  
Minnesota non-profit corporation; GC  
SERVICES, LP, a Delaware limited  
partnership; and DOES 1-20, inclusive,  
  
Defendants.

CASE NO. 2:18-cv-01495-JAD-CWH

**STIPULATION AND JOINT REQUEST TO  
EXTEND TIME FOR DEFENDANT  
EDUCATIONAL CREDIT MANAGEMENT  
CORPORATION TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

(Second Request)

Complaint served: 9/13/18  
Current response date: 10/18/18  
Proposed new response date: 10/29/18

Plaintiff LEISA WHITTUM ("Plaintiff") and Defendant EDUCATIONAL CREDIT MANAGEMENT CORPORATION ("Defendant ECMC"), through their respective counsel, hereby stipulate and jointly request that Defendant ECMC shall have an extension of time, up to and including October 29, 2018, within which to respond to Plaintiff's Complaint on file herein. This is the second stipulation for an extension of time for Defendant ECMC to respond to Plaintiff's Complaint. The first stipulation requested a two-week extension, to October 18, 2018, which was granted by the Court. Due to press of business, unavailability of counsel, and the relatively complex

1 factual history of this matter, Defendant ECMC hereby seeks an additional brief extension, to  
2 October 29, 2018, as Defendant ECMC needs more time to investigate Plaintiff's claims. This joint  
3 request is also based on the fact that the requested extension is relatively short, and the parties  
4 believe that no currently scheduled Court hearing or other event will be impacted by the extension.  
5 The parties further agree that the requested extension is made in good faith, and will not cause any  
6 prejudice to them.

7 Respectfully submitted,

8  
9 DATED: October 18, 2018 ALVERSON TAYLOR & SANDERS

10  
11 By: s/Trevor R. Waite  
12 Kurt R. Bonds  
13 Trevor R. Waite  
14 Attorneys for Defendant  
EDUCATIONAL CREDIT MANAGEMENT  
CORPORATION

15 DATED: October 18, 2018 LAW OFFICE OF BRIAN D. SHAPIRO, LLC

16  
17 By: s/Brian D. Shapiro  
18 Brian D. Shapiro  
19 Attorneys for Plaintiff  
LEISA WHITTUM

20  
21 IT IS SO ORDERED:

22  
23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: October 19, 2018